

FOOD CONTACT

BYK Regulatory Information

BYK-3400

Silicone-containing substrate wetting additive for aqueous coatings, adhesives and maintenance products to reduce the surface tension. Good substrate wetting, no increase in the surface slip.

Summary

BYK-3400 is suitable according to the following compositional provisions for food contact applications, as indicated:

Adhesives		
EU	Suitable for food contact adhesives	Yes
	Regulation (EU) No. 10/2011	Yes
	German BfR XIV 'Polymer Dispersions'	Yes
	German BfR XXXVI 'Paper and board for food contact'	Yes
USA	21 CFR 175.105 'Adhesives'	Yes
China	GB9685-2016, table A.5 'Adhesives'	No
Paper and paperboard		
Europe	Suitable for food contact paper and paperboard	Yes
	Regulation (EU) No. 10/2011	Yes
	German BfR XXXXVI 'Paper and board for food contact'	Yes
USA	21 CFR 176.170	No
	'Components of paper and paperboard in contact with aqueous and fatty foods'	
	21 CFR 176.180	No
'Components of paper and paperboard in contact with dry food'		
China	GB9685-2016, table A.6 'Paper'	No
Printing inks		
Europe	Suitable for food contact printing inks	Yes
	Swiss Ordinance 817.023.21 (Annex 10)	Yes
Industry	Nestlé Guidance note on Packaging Inks (October 2018)	Yes
	EuPIA Exclusion List (November 2016 - Corrigendum Dec. 2018)	Yes

This summary only reflects conducted evaluations on existing regulations. It does not exclude compliant use in additional regions or applications. Explanations below show details on considered regulations and evaluations.

Explanation

Adhesives

EU

Regulation (EU) No. 10/2011

The product complies with the compositional requirements of COMMISSION REGULATION (EU) No. 10/2011 of 14 January 2011 (PIM) on plastic materials and articles intended to come into contact with food (including all amendments).

German BfR XIV 'Polymer Dispersions'

The product complies with the compositional requirements of the German BfR-Recommendation XIV 'Polymer Dispersions'.

German BfR XXXVI 'Paper and board for food contact'

The product complies with the compositional requirements of the German BfR-Recommendation XIV 'Paper and board for food contact'.

Dual use additive

The product contains a 'dual use additive' (< 0.01%) for which restrictions apply: 2,6-Di-tert-butyl-p-cresol (BHT; CAS-No. 128-37-0, E321).

Therefore, the product can be recommended for use in food contact adhesives in the EU, as described above.

USA

21 CFR 175.105 'Adhesives'

The product is covered by the compositional requirements of Sec. 175.105.

China

GB9685-2016, table A.5 'Adhesives'

The product is not covered by table A.5 'Adhesives' of the GB9685-2016.

Paper and paperboard

Europe **Regulation (EU) No. 10/2011**

The product complies with the compositional requirements of COMMISSION REGULATION (EU) No. 10/2011 of 14 January 2011 (PIM) on plastic materials and articles intended to come into contact with food (including all amendments).

German BfR XXXVI 'Paper and board for food contact'

The product complies with the compositional requirements of the German BfR-Recommendation XIV 'Paper and board for food contact'.

Therefore, the product can be recommended for use in food contact adhesives in the EU.

USA **21 CFR 176.170 'Components of paper and paperboard in contact with aqueous and fatty foods'**

The product does not comply with the compositional requirements of 21 CFR 176.170.

21 CFR 176.180 'Components of paper and paperboard in contact with dry food'

The product does not comply with the compositional requirements of 21 CFR 176.180.

Therefore, the product cannot be recommended for paper and paperboard in contact with food.

China **GB9685-2016, table A.6 'Paper'**

The product does not comply with table A.6 'Paper' of the National Food Safety Standard of the People's Republic of China, Standard for Uses of Additives in Food Contact Materials and Articles, GB9685-2016.

Printing inks

Europe **Swiss Ordinance 817.023.21 (Annex 10)**

This product is conform with the compositional requirements of the part for printing inks for packaging of the Swiss Ordinance 817.023.21 (Version of 1 December 2020) since all components are listed in Annex 10. Specific migration limits apply.

Additional note: the non-listed D4 (CAS 556-67-2) is present, as an impurity. Its amount is referred to in our BRIEF document.

Therefore, the product can be recommended for use in food contact printing inks in Europe.

Industry **Nestlé Guidance note on Packaging Inks (October 2018)**

According to the recipe, the product does not contain any of the substances listed in Table 1 – Table 7 of the Nestlé Guidance note on Packaging Inks (dated October 2018).

EuPIA Exclusion List (November 2016 - Corrigendum Dec. 2018)

According to the recipe, none of the substances listed in Annex 1 (Group C – G) of the EuPIA Exclusion List (November 2016 - Corrigendum Dec. 2018) are present. The product itself is not classified and labeled with any of the Hazard Statements given in Group A and B.

General Remarks

Regulations apply within the context of respective regional framework regulations, e.g. Regulation (EU) No. 1935/2004 and FDA 21 CFR 174.5. Since traces of unknown processing aids cannot be fully excluded, compliance with general requirements is the responsibility of the end user.

BYK reserves the right to change or update the information without notice. At most, this letter deems to be actual for three years commencing the date of issue.

Food Contact Team
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This issue replaces all previous versions

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